

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America
v.

Jawaun Viverette

Defendant(s)

Case No.

1:21-mj-00974

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or about 11/12/2018 to present in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:*Code Section*

18 U.S.C. § 2251(d)(1)(A)

18 U.S.C. § 2252(a)(1)

Offense Description

Noticing and Advertising Child Pornography

Transportation of a Visual Depiction of a Minor Engaged in Sexually Explicit
Conduct

This criminal complaint is based on these facts:


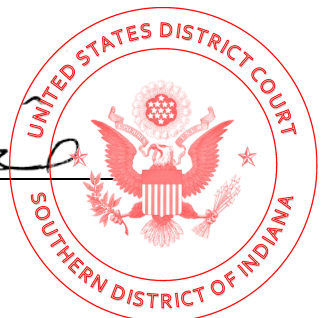
See attached Affidavit.

☒ Continued on the attached sheet.

s/Laura Smith

Complainant's signature

Laura Smith, Task Force Officer

*Printed name and title*Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone *(reliable electronic means)*Date: October 21, 2021City and state: Indianapolis, Indiana
Mark J. Dinsmore
United States Magistrate Judge
Southern District of Indiana

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Laura Smith, being duly sworn, hereby depose and state as follows:

1. **Affiant:** I am a Detective in the Cybercrime Unit of the Indianapolis Metropolitan Police Department (IMPD). I am also a cross-designated Task Force Officer with the United States Secret Service.

2. **Experience:** I have over 24 years of law enforcement experience. I have investigated State and Federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I have written numerous search warrants involving internet crimes against children cases and participated in their execution.

3. **Training:** I have attended and presented at the National Crimes Against Children Conference and attended numerous classes related to investigating the online sexual exploitation of children. I am a member of the Indiana Internet Crimes Against Children (ICAC) Task Force, which includes federal, state, and local law enforcement agencies. I am currently assigned to operate in an undercover capacity on the internet to identify and investigate persons attempting to exploit or solicit sexual acts with children or trafficking in child pornography. As a Task Force Officer, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

4. **Information provided:** The statements in this affidavit are based on information obtained from my observations and communications, as well as information learned from other law enforcement officers and witnesses. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, I have not included each and every fact known to the investigators concerning this investigation. I have set forth only the facts that

I believe are necessary to establish probable cause that **JAWAUN VIVERETTE** committed a criminal offense.

5. **Probable Cause:** For the reasons listed below, there is probable cause to believe that **JAWAUN VIVERETTE (VIVERETTE)**, DOB xx-xx-1998 (known to affiant, but redacted) has committed the following offense in the Southern District of Indiana and elsewhere:

A. **Count 1: Noticing and Advertising Child Pornography**

B. **Count 2: Transportation of a Visual Depiction of a Minor Engaged in Sexually Explicit Conduct.**

6. **Noticing and Advertising Child Pornography: 18 U.S.C. § 2251(d)(1)(A):** This investigation concerns alleged violations of 18 U.S.C. § 2251(d)(1)(A) which prohibits a person from knowingly making, printing, and publishing, and causing to be made, printed and published, any notice and advertisement seeking and offering to exchange, produce, display, and distribute any visual depiction, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depiction was of such conduct, where the Defendant knew and had reason to know that such notice or advertisement would be transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mailed; or such notice or advertisement was transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mailed.

7. **Transportation of a Visual Depiction of a Minor Engaged in Sexually Explicit Conduct: 18 U.S.C. § 2252(a)(1):** This investigation concerns alleged violations of 18 U.S.C. § 2252(a)(1), which prohibits a person from knowingly transporting or shipping any

visual depiction of a minor engaging in sexually explicit conduct when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce.

8. **Definitions:** The following definitions apply to this Affidavit:

A. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

B. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

C. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

D. The term “hyperlinks” or “links,” in computing, is a reference to data that the user can follow by clicking or tapping. A hyperlink points to a whole document or to a specific element within a document (Source: Wikipedia). A Hyperlink provides direct access from one distinctively marked place in a hypertext or hypermedia document to another in the same or a different document.

9. **Investigation of JAWAUN VIVERETTE (VIVERETTE):** This investigation began when Your Affiant received a CyberTipline Report showing that the internet-based application Dropbox was used to upload several files of child pornography to Dropbox. The files depict minors engaged in sexually explicit conduct. The data within the Dropbox account also showed that the Drobox account was sued to share content, by means of hyperlinks, that contained sexually explicit visual depictions of identified minor children. An investigation showed that the Dropbox account was connected to an iCloud account belonging to Jawaun Viverette with cell phone number 1-219-321-XXXX (redacted).

10. **Investigation Begins:** On March 24, 2021, I received CyberTip number 85616468 from the National Center for Missing and Exploited Children (NCMEC), which alerts law enforcement to reports of sexual exploitation of children on the Internet. In CyberTip #85616468, Dropbox reported to NCMEC conduct by Dropbox Screen/User Name: **Jawaun Viv**, email address jawaunviv98@icloud.com (verified on 9/4/2018), ESP User ID: 1456610912.

A. Dropbox reported **Jawaun Viv** uploaded three hundred and two (302) files. They reported the last login to the account via IP address 2601:805:c101:b0:c9c4:3b5e:8eaa:b820on 8/27/2020 at 05:35:09 UTC.

B. Many of the files appeared to show naked, pubescent minor males whose genitals were exposed.

C. Some of the files appeared to be “sets,” meaning the same pubescent minor male was depicted in a series of different files.

i. One such set included the following filenames: **IMG_2421.jpg, IMG_2423.jpg, IMG_2424.jpg, IMG_2426.jpg, IMG_2427.jpg, IMG_2438 (2).jpg, IMG_2439(2).jpg, IMG_2444 (2).jpg, IMG_2447 (2).jpg,**

IMG_2448.jpg, IMG_2449(2).jpg, IMG_2451 (2).jpg, IMG_2453 (2).jpg, IMG_2454 (2).jpg, IMG_IMG_2455 (2).jpg, IMG_2456(2).jpg, IMG_2457(2).jpg, IMG_2458.mp4, IMG_2681 (2).jpg, IMG_2682.jpg, IMG_2685.jpg, IMG_2687.jpg, IMG_2689.jpg, IMG_2690.jpg, IMG_2692.jpg, IMG_2693.jpg, IMG_2698 (2).jpg, IMG_2703 (2).jpg, IMG_3466.jpg, IMG_3927, IMG_3929.jpg, and IMG_3933.jpg.

ii. Your Affiant describes this series of files as depicting a naked or semi-naked pubescent minor male in various poses which include the lascivious display of his genitals and anus.

11. On March 24, 2021, I queried the American Registry of Internet Numbers for the IP Address 2601:805:c101:b0:c9c4:3b5e:8eaa:b820. I learned that this IP Address is serviced by Comcast Cable Communications, Inc. I then requested a Marion County Grand Jury subpoena for the associated IP address subscriber of the Comcast Cable Communications customer used during the login. Unfortunately, this was beyond the six-months which Comcast keeps customer records, and so I could not obtain data for this IP Address for August 27, 2020.

12. On March 24, 2021, I requested a search warrant for the Apple iCloud account associated with jawaunviv98@icloud.com and the Dropbox account with screen/username Jawaun Viv, ESP User ID: 1456610912. The search warrant was granted in the Marion County (Indiana) Superior Court. The warrant was then sent to Apple, Inc. and Dropbox.

13. On April 1st, 2021, Apple, Inc. responded that there was no account associated with the #49D23-2103-MC-008969 search warrant order.

14. On April 1st, 2021 I received the Dropbox, Inc. records for the Dropbox account with screen/username **Jawaun Viv**, ESP User ID: 1456610912.

A. Records showed the user of this account to be Jawaun Viv with email address jawaunviv98@icloud.com.

B. Subscriber information showed two associated devices: an iPhone 10 until April of 2020 and then an iPhone 12 until September of 2020.

C. Within the account were 99 folders with names which included, but not limited to, the following: “Dd”, “Dorito Boyz”, “Files”, “Freaky”, “legendbaits brothers”, “Lil slave (1)”, “Mass Collection”, “Mass Collection 2”, “Mass Collection 3”, “Mass Collection 4”, “Previews”, “Sextapes 1”, “Silento nudes”, “Silento nudes (1)”, “Slave (1)”, “Sleeping”, “Store”, “TumblrPaid”, “Vault”, “Vault (1)”, “wander”, and “Young Bull”.

i. Many of the other filenames appeared to be male names.

ii. Many of the folders contained several subfolders. All told, the Dropbox account contains 81,816 files with 2,652 total folders.

D. A review of the subfolders revealed multiple files depicting minor males engaged in sexually explicit conduct.

i. For example, subfolder named “HE(1)” contained 105 files depicting a pubescent teen male in various poses with his penis exposed. Subfolder named “Slave (1)” contained 1,064 files of a pubescent teen male in various poses with his penis and anus exposed.

ii. Other subfolder names included a name and a number, such as felix XXXX(redacted) -12. The felixXXXX-12 subfolder contained 6 files. Four of the files included a pubescent male with his penis exposed, and two of the files included the face of the male.

iii. Another subfolder had the name listed as XXXXXXXX (redacted) High School. The folder contained 71 subfolders with male names. The files inside the folders show teen males with their genitals exposed and/or engaged in sexually explicit conduct.

iv. A folder identified with “Younger Boys” included 103 subfolders. The filenames on the folders were labeled with initials and had different monetary denomination listed with the initials. An example of this naming convention was “AB-\$25 (RN,NV)”.

E. **Known Minor Victims:** Through my work with ICAC other agents engaged in similar child sexual exploitation and child pornography trafficking investigations, I recognized the material in the **Jawaun Viv** Dropbox account to contain a portion of files which have been seen in other investigations. Through separate investigations, some of the males whose sexually explicit images are found in the Jawaun Viv Dropbox account have been identified. Your Affiant is aware that the Jawaun Viv Dropbox account does, therefore contain more than one sexually explicit visual depiction of a minor male. Because of this, I know that the Dropbox account holder transported these sexually explicit visual depictions of known and identified minors from an unknown source to his Dropbox account using the internet, and the account holder possessed these depictions of known and identified minors in the Dropbox account.

F. Other filenames in the **Jawaun Viv** Dropbox account appeared to be names with connections to the Indianapolis, Indiana area. For example, there were three folders with “(name redacted) Indy Pike” and one folder “(name redacted) Indy LC,

which Your Affiant believes referred to Pike High School and Lawrence Central High School.

15. On August 25th, 2021, I learned that there was an issue with the spelling of the iCloud account name in the first Apple, Inc. search warrant order. I then requested another search warrant for the correct spelling of the account in the affidavit order as **jawaunviv98@icloud.com**. This search warrant was granted in the Marion County (Indiana) Superior Court.

16. The Apple, Inc. iCloud data for **jawaunviv98@icloud.com** was received on September 22, 2021. Apple, Inc. records showed the cellular phone number associated with the iCloud account **jawaunviv98@icloud.com** was 1-219-321-XXXX (redacted).

17. Open-source research of the phone number (1-219-321-XXXX (redacted)) revealed that the number belonged to an individual identified as Jawaun Viverette.

A. An IMPD police report in April of 2018 under case IP180044090 showed an individual identified as Jawaun Viverette, date of birth in 1988, connected with phone number 1-219-321-XXXX (redacted) and 219-687-XXXX (redacted).

B. An IMPD police report in December of 2019 under case IP190142605 also showed the same individual, Jawaun Viverette, with phone number 219-321-XXXX (redacted).

C. An IMPD police report in March of 2021 under case IP210029333 showed Jawaun Viverette (Viverette) reporting that he had an iPhone 11 which was stolen from him. At the time of the report, Viverette provided the address of 5241 Ochs Avenue, Indianapolis, Indiana 46254. The iPhone was recovered and placed into the IMPD property room after being recovered. At the time of the report, Viverette provided

another phone number identified as 317-792-XXXX (redacted). Your Affiant confirmed that the iPhone was released back to Viverette on September 16, 2021.

18. A query to the Indiana Bureau of Motor Vehicles (BMV) revealed an Indiana driver's license for Jawaun Viverette, XX-XX-1998 (redacted) with an address of 5241 Ochs Avenue, Indianapolis, Indiana 46254.

19. **Search Warrant:** On October 20, 2021, Your Affiant and other members of the Indiana ICAC Task Force and the IMPD executed a federal search warrant at 5241 Ochs Avenue in Indianapolis, in the Southern District of Indiana.

A. Jawaun Viverette was located inside the residence and walked to the mobile forensic vehicle for interview. The interview was audio- and video-recorded. At 9:27 AM, I read the *Miranda* rights from a document to Jawaun Viverette.

B. While asking preliminary questions about who lived in the home, Viverette said his parents lived there. He seemed annoyed, and although he said he understood the advice of rights and said he graduated from high school, he refused to disclose where he had attended school. Viverette repeatedly asked the nature of the investigation, even after being told it was an internet investigation. Viverette provided limited cooperation in identifying the parties who lived with him and family member information.

C. Through the course of the interview, Viverette provided his cellular phone number as 219-321-XXXX (redacted) and said he has had the same number since high school. This is the same phone number associated with the iCloud account referenced above. Viverette said the iPhone was serviced through AT&T and is in a family plan with his mother.

D. While discussing devices in his home, Viverette reported he worked for a home improvement store call center from home and used a laptop provided by the company.

E. Viverette provided several social media account names: Facebook (Jawaun Viverette), Instagram (Jawaun98), Snapchat (Jawaun98), and Google (jawaun021998@gmail.com). He said his current email address was jawaun98@icloud.com.

F. Viverette initially denied having a Dropbox account or any cloud storage. He said he simply uses his phone and doesn't back up his iPhone to the cloud. He denied using any cloud storage to back up his cell phone. He said he has enough storage on his phone and did not need to have anything backed up.

G. Through the course of the interview, Viverette ultimately admitted he previously had two Dropbox accounts, but he said he did not recognize the email account jawaunviv98@icloud.com as associated with it. Viverette said that he thought the email account associated with it was jdizzle98@icloud.com and said could not remember the other one. Viverette said the last time he used Dropbox was back in high school in 2016. After being confronted with the fact that he had signed into the account in August of 2020, Viverette said he did not recognize or remember the email account jawaunviv98@icloud.com.

H. Viverette said the internet service at his house was provided through Comcast.

I. While discussing the contents of the Dropbox account, Viverette confirmed that he went to Pike High School. He said that he used Dropbox for

documents for school and “clicking on links on Twitter”. He indicated that he was using Twitter for pornography.

J. After discussing the process for examining digital devices, Viverette continued to say that he could not remember making the Dropbox account. I then advised Viverette that some of the folders within the account included males whom I suspected went to high school with Viverette.

K. Viverette said he watches a lot of “Twitter porn” and provided his Twitter username as JawaunV. While discussing the “Twitter porn,” Viverette said that it is possible that he may have received the Dropbox files from Twitter. Viverette said that he clicks hyperlinks on other users’ timelines, and those links open in Dropbox. He said that it may save to his Dropbox account, but he was not sure.

i. Viverette said that he had been clicking on Twitter links to obtain pornography for about 2-3 years.

ii. He said that he does not communicate with others on Twitter, but rather he simply clicks on other users’ timelines to find the hyperlinks. Viverette said that he simply clicked on the hyperlinks and then would click out of it if the material wasn’t what he wanted.

iii. Viverette agreed that he would manage his Dropbox account and delete things that he didn’t want or like.

iv. Viverette further denied making or creating any folders and said that most of the time the material from hyperlinks came with folders already labeled and named.

v. While discussing the Dropbox files, I asked if he had a CashApp account. He provided his username as jawaunv.

vi. Viverette denied purchasing hyperlinks and said that he would only download the contents of hyperlinks.

L. I specifically asked Viverette about the file folders in the Dropbox account which included the males with whom he may have gone to high school.

i. I showed Viverette four male images with their identified names. Viverette recognized two of the males and said that he knew them from high school.

ii. Viverette said he may have received those files while he was in high school. Viverette said that both males knew that he was in possession of each male's sexually explicit files.

iii. Viverette said one of the males he talks to frequently and believed that one of the males "air-dropped" him the images when they both were in high school.

M. Viverette denied using a different persona to obtain the sexually explicit images in his Dropbox account. He admitted had done that in the past when he was younger and lived in Gary, Indiana. Viverette denied ever paying anyone for "bait" material or files.¹

N. When asked where the rest of the files in the Dropbox came from, Viverette said he only clicked on hyperlinks to obtain the files. He said they were free

¹ "Bait material" refers to images or videos of another person that are used to create a false persona online. Using that false persona and images, the "baiter" will trick an individual into believing the baiter is someone else so that individual will send sexually explicit images to the baiter.

and never paid for them. He elaborated and said that some people got tired of others selling hyperlinks and would post the hyperlinks (and their content) for free.

O. Viverette said he was also on Tumblr in approximately 2019 before it got shut down. He said others would post photos on Tumblr pages, and he would click on the link, and the content would download to his Dropbox account.

P. I then asked Viverette if he had MEGA, which he said he did². Viverette said that he backed up his phone to the MEGA application. I then confronted Viverette with the prior statement that he didn't use cloud storage. He said that no one was going to get into it because it is password protected. Viverette said that it contained pictures from high school and other males with whom he communicates.

Q. Viverette said he believed most of the contents in his Dropbox were appropriate files. He denied having any files which he believed were child pornography. I then specifically mentioned a file folder identified as "store" which contains images of videos of child pornography, including visual depictions of identified minor children. Viverette said he received "Store" from Twitter or Tumblr.

R. I explained to Viverette that Dropbox removed his account in February of 2021. Viverette said that he was unaware that the folder contained files of child pornography and was simply clicking on hyperlinks. I explained to Viverette that there were several other folders which contained images of videos of minor males. He again said that he downloaded hyperlinks from Twitter and Tumblr.

² MEGA is a cloud storage and file hosting service offered by MEGA Limited, a company based in New Zealand. The service is offered through web-based apps. MEGA mobile apps are also available for Android and iOS. MEGA is known for the largest fully featured free cloud storage in the world with 20 GB storage allocation for free accounts. Data on Mega services is end-to-end encrypted client-side. Since Mega does not know the encryption keys to uploaded files, they cannot decrypt and view the content.

S. While discussing MEGA, Viverette said that with respect to everything in his MEGA account, he put those files in there specifically. He said that he uses MEGA because it has more storage space.

T. Viverette said he got a new iPhone in April of 2021 and has the Dropbox application, but was unsure whether he signed into the account.

U. Viverette explained that sometimes he would see male files on his female friends' phones. He said that the female friends would share the male files to his phone for his usage.

V. Viverette attempted to explain that he may have accessed certain files when he was in high school, but he could not explain why the files were still in his Dropbox account and were accessed last in 2020.

20. **Dropbox shared links:** The records from Dropbox, Inc. revealed eleven (11) shared hyperlinks. Those links included the following files:

A. **Link 1** (full hyperlink known to law enforcement but redacted): shared 10/17/2018—Two males sitting on a couch next to each other.

B. **Link 2** (full hyperlink known to law enforcement but redacted): shared 10/20/2018—This folder contains 238 files of a pubescent teen male. Many of the files depict the teen male with his penis and/or anus exposed.

C. **Link 3** (full hyperlink known to law enforcement but redacted): shared 10/21/2018—This folder contains 20 files of a pubescent teen male. Many of the files depict the teen male with his penis exposed.

D. **Link 4** (full hyperlink known to law enforcement but redacted): shared 11-12-2018—This folder contains 98 subfolders with initials. Based on other law

enforcement investigations known to this Affiant, this file system and subfolders contain a large number of teen male visual depictions, and the identities of some of these males are known to be minors. Some of the visual depictions of these identified minors include depictions of their lasciviously displayed genitals or anuses and / or depictions of them engaged in sexually explicit conduct. This folder, “store,” contains 12,396 files.

E. **Link 5** (full hyperlink known to law enforcement but redacted): shared 3-31-2019—This folder contains 100 files of a pubescent teen male. Many of the files show the teen male with his penis exposed.

F. **Link 6** (full hyperlink known to law enforcement but redacted): shared 4-15-2019—This folder contains 21 files; however, the male appears to be an adult.

G. **Link 7** (full hyperlink known to law enforcement but redacted): shared 4-20-2019—This folder contains a subfolder “5”, which contains 8 items, including videos depicting a pubescent teen male with his penis exposed.

H. **Link 8** (full hyperlink known to law enforcement but redacted): shared 4-20-2019—This folder contains two subfolders identified as “Free Collection” and “Free Collection 2”. Free Collection contains 303 files of what appear to be adults and other subfolders. Free Collection 2 contains 243 files of what appear to be adults and other subfolders.

I. **Link 9** (full hyperlink known to law enforcement but redacted): shared 4-20-2019—This folder contains 56 files of images and videos of two pubescent teen males with their genitals and anuses exposed and/or engaged in sexually explicit conduct.

J. **Link 10** (full hyperlink known to law enforcement but redacted): shared 7-30-2020—This folder contains 26 subfolders, many of the subfolders contain sexually explicit material of pubescent teen males. The total amount of files is 5,145 files.

K. **Link 11** (full hyperlink known to law enforcement but redacted): shared 7-30-2020—This folder contains 10 files of what appears to be an adult male with his penis exposed.

21. **Advertising Child Pornography:** By sharing the Dropbox hyperlinks above (paragraph 19), including specifically Link 4, which contains sexually explicit visual depictions of identified minor children, Viverette did knowingly make, print, or publish, or cause to be made, printed, or published, any notice or advertisement seeking or offering to receive, exchange, buy, produce, display, distribute, or reproduce, any visual depiction, where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct and such notice or advertisement was transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means including by computer or mailed.

22. An open-source Google search for Jawaun Viverette revealed that he obtained a Paycheck Protection Program (PPP) loan from Capitol Plus Financial, LLC in April of 2021. This loan was reported to support a barber shop. Your Affiant asked Viverette about the loan, based on the information Viverette provided about working for a call center. When asked, Viverette said he never owned a business or went to a trade school. He later said he worked at a friend's at-home barbershop, but refused to provide details on the friend. I then asked him about the PPP loan. He said that he heard about the paycheck protection loan on Snapchat and filled out the application on the internet with the help of the unidentified person from Snapchat. He

admitted that he signed his name on the application and later received \$7,000, which went to his Charm account. Viverette said someone did the application for him and Viverette used the money to buy a car and paid bills. I told him that it sounded like fraud, and he only replied, “okay”. Viverette said that he kept all the money, and the other person did not charge him. Viverette said that he filled it out online and they signed in and finished it because they knew how to do it. Viverette said he was not sure how it was approved. Viverette said he received the money in June of 2021. Viverette said he was in a “rough space” and was about to be homeless and that was why he did it.

23. **Forensic Examination of Digital Devices Located:** Detectives located three cellular phones which appeared to be currently used by Viverette, two iPhones and one Android phone. During the interview, Viverette initially refused to provide the passcode to his current iPhone. Eventually he did provide the passcode to one of his iPhones, but Viverette provided the incorrect password to his Android phone. The phones are still being forensically examined at the time of the writing of this Affidavit.

24. **Interstate and Foreign Commerce:** Dropbox operates using the Internet, a means and facility of interstate and foreign commerce. Dropbox, Inc. is headquartered in California.

25. **Venue:** The Defendant’s conduct occurred in the Southern District of Indiana and elsewhere, and the Defendant is a resident of the Southern District of Indiana.

26. **Conclusion:** Based upon the contents of this Affidavit, there is probable cause to believe that **JAWAUN VIVERETTE** has committed the above-listed offense. I respectfully


request that the Court issue a Criminal Complaint and Arrest Warrant for **JAWAUN VIVERETTE** charging him with the offense listed above.

s/Laura Smith

Task Force Officer Laura Smith
United States Secret Service

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephonic communication.

Dated: October 21, 2021


Mark J. Dinsmore
United States Magistrate Judge
Southern District of Indiana

